

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

G.M.G.,

Petitioner–Plaintiff,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Respondents–Defendants.

Case No. 1:25-cv-00195-MRD-PAS

[PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of Petitioner-Plaintiff’s Motion for a Temporary Restraining Order:

Having determined that Petitioner-Plaintiff (“Petitioner”) is likely to succeed on the merits of his claims that the Proclamation violates the Alien Enemies Act (“AEA”), 50 U.S.C. § 21 *et seq.*; that the AEA does not authorize Respondents-Defendants (“Respondents”) to summarily remove him from the United States; that Respondents’ actions implementing removals under the AEA violate due process, the Immigration and Nationality Act, and statutes providing protection for those seeking humanitarian relief; that in the absence of injunctive relief Petitioner will suffer irreparable injury in the form of unlawful removal that may be irreversible; and that the balance of hardships and public interest favor temporary relief, it is, therefore,

ORDERED that Petitioner’s Motion for a Temporary Restraining Order is hereby GRANTED without notice, due to the extreme speed at which removal from this District may occur and the irreparable consequences of the Court’s potential loss of jurisdiction; and that Respondents (excluding the President with respect to any injunctive relief), their agents, representatives, and all persons or entities acting in concert with them are hereby:

1. **ORDERED**, pending further order of this Court, not to remove Petitioner from the United States under the Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua”;
2. **ORDERED**, pending further order of this Court, not to transfer Petitioner from the District of Rhode Island; and
3. **ORDERED**, pending further order of this Court, to provide Petitioner and undersigned counsel with notice of any designation as an Alien Enemy under the Proclamation at least 30 days prior to any removal pursuant to the Proclamation.

It is further **ORDERED** that Petitioner shall not be required to furnish security for costs.

Entered on _____, of April 2025, at _____ a.m./p.m.

United States District Court Judge